

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MOLLI CHANG	:	
	:	
Plaintiff	:	
	:	CASE NO.: 8:22-cv-2208
v.	:	
	:	
WMATA, et al.	:	
	:	
Defendants.	:	

PLAINTIFF'S DISCLOSURES ON DAMAGES

NOW COMES Plaintiff, Molli Chang, by and through undersigned Counsel pursuant to this Court's Scheduling Order and Fed. R. Civ. P. 26(a)(1)(A)(iii) and files her Disclosure on Damages.

I. MEDICAL BILLS TO DATE

Plaintiff incurred the following medical bills to date, which she alleges are causally related to the subject occurrence. The Plaintiff continues to experience pain and is continuing to seek treatment for her injuries. The Plaintiff reserves the right not to introduce medical bills into evidence at trial:

Date(s) of Service	PROVIDER	Amount
6/27/2019	Montgomery Co. EMS	\$ 528.90
6/27/2019	Washington Adventist Hospital - White Oak Medical Center	\$ 501.84
6/22/20 - 01/27/22	MedStar - Dr. Foley Ortho	\$ 1,333.00
11/11/2020 - 07/08/2022	Johns Hopkins Health System	\$ 14,187.57
04/28/22 - 12/01/2022	Nourishing Life	\$ 2,885.00
12/18/2019 - 07/07/2020	Progressive Radiology	\$ 3,006.00
08/16/2018 - 10/10/2019	Suburban NRH Medical Services	\$ 9,357.00
01/15/2020 - 05/13/2020	MedStar NRH/Lutherville Hand Center	\$ 4,384.00

08/22/2019 - 10/07/2021	Awaken Wellness	\$ 10,765.00
	TOTAL	\$ 46,948.31

Ms. Chang missed a very short period of time from work, but is not making a lost wage claim.

II. NONECONOMIC DAMAGES

Ms. Chang sustained physical injuries to her right elbow and right hand, as set forth more fully in the medical records. The pain in Ms. Chang's elbow resolved quickly, but the pain in her right hand continues to this day. She believes she suffers from a permanent injury, but is still seeking some treatment to help alleviate the pain. It affects large and small aspects of her life in which she is required to use her dominant hand. The pain she experiences is constant, but is worsened when she uses her hand or accidentally bumps it against something.

All documents evidencing Plaintiff's damages to date have been provided to Defendant WMATA.

/s/ Jonathan R. Carroll
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CERTIFICATE OF SERVICE

I hereby certify that on February 1st 2023, a copy of the foregoing Disclosure on Damages was electronically filed and sent to the following persons via electronic mail, the CM/ECF system and the U.S. Postal Service:

Brendan H. Chandonnet
Washington Metropolitan Area Transit
Authority Office of General Counsel 7E
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/s/ Jonathan R. Carroll

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